

In re CLI Holdings Inc. dba Alydian

EXHIBIT “A” to Motion under B.R. 2004 for Production and
Examination of Bitvestment Partners, LLC (“Bitvestment”)
Documents to be Produced

1. All documents¹ which formally identify all investors or equity holders in Bitvestment.
2. All documents relating to the change of name of Dalsa Barbour, LLC to Bitvestment.
3. All draft or final operating agreements, articles of incorporation, bylaws for Dalsa Barbour, LLC and Bitvestment.
4. All Bitvestment’s and Dalsa Barbour, LLC’s corporate minutes from August 1, 2013 to the present.
5. All documents related to any goods or services provided by Bitvestment, Dan Gallancy and Dalsa Barbour LLC under the August 14, 2013 Amended and Restated Bitcoin Services Agreement (hereinafter, the “Agreement”).
6. All documents related to any assignment of the Agreement.
7. All documents concerning efforts by Bitvestment, Dan Gallancy or Dalsa Barbour LLC to secure investment from third parties related to Claim².
8. All communications from August 1, 2013 to the present between Bitvestment, Dan Gallancy or Dalsa Barbour LLC and any third parties regarding or relating to the Claim.
9. All documents supporting Bitvestment’s quantification of the Claim.
10. Any communications with third parties related to the Agreement and Bitvestment’s allegations of breach of the Agreement.

¹ For purposes of this production, “Documents” include contracts, letters, email, invoices, agreements, memorandum, billings, and notes of any kind.

² For purposes of this production, “Claim” shall mean Bitvestment’s Claim against the Chapter 11 estate of CLI Holdings, Inc.